

IN IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN THE MATTER OF THE	§	
COMPLAINT AND PETITION OF	§	4:24-CV-02568
TIMTOM LAND HOLDINGS, LLC AS	§	NOTICE OF CLAIM
OWNER OF THE MV <i>JACQUES-IMO</i> ,	§	
SHAMROCK MARINE, LLC AS	§	SVETLANA ONYSCHCHENKO,
OWNER OF THE T/B SHAMROCK 500	§	INDIVIDUALLY AND AS REP OF THE
AND BUFFALO MARINE SERVICE,	§	ESTATE OF YURI ONYSCHCHENKO
INC. AS OWNER PRO HAC VICE OF	§	DECEASED; AVTUTOVA OLGA
<i>SHAMROCK 500</i> IN A CAUSE OF	§	YURIEVNA
EXONERATION FROM OR	§	
LIMITATION OF LIABILITY	§	

NOTICE OF CLAIM OF SVETLANA ONYSCHCHENKO, INDIVIDUALLY AND AS REP
OF THE ESTATE OF YURI ONYSCHCHENKO, DECEASED;
AVTUTOVA OLGA YURIEVNA

Subject to and without waiving his rights to pursue their claims separate from this action, Svetlana Onyschchenko, Individually and as Representative of the Estate of Yuri Onyschchenko, Deceased; Avtutova Olga file this Claim against Complainants and would show as follows:

- (1) Claimants are residents of Russia.
- (2) Decedent is a seaman and was assigned to the vessel *The Stride*.
- (3) Complainant owned, owned pro hac vice, manned, managed, chartered, leased, operated, crewed, and/or controlled the *Stride*.
- (4) At all times relevant to this claim, the *Stride* was a U.S. flagged vessel-in-navigation, operating.

(5) On or about January 8, 2024, the deceased, while working aboard the *Stride* sustained fatal injuries in a fire.

(6) Claimants have filed a lawsuit against Complainant which is filed in Harris County, Texas under Cause No. 2024-33824;

(7) In the lawsuit, Claimants allege that they are entitled to recover

- a. Past and future mental anguish;
- b. Past and future loss of companionship and society;
- c. Loss of financial support from Konstantin;
- d. Loss of inheritance;
- e. Funeral and burial expenses.

Yuri Onyschchenko, deceased, suffered the following:

- a. Pain and suffering prior to death;
- b. Death; and
- c. Loss of income.

In sum, Claimants have provided Complainant and this Court with notice of their Claim in this document, and in their separately filed Answer, and requests the Court to dismiss Foss Maritime Company's Complaint and grant him all other relief to which he is justly entitled.

Respectfully submitted,

ROBERTS MARKLAND LLP

/s/Anjali Sharma

Vanessa D. Gilmore

State Bar No. 07960010

Sean A. Roberts

State Bar No. 00797328

Anjali Sharma

State Bar No. 24094403

2555 N. MacGregor Way

Houston, Texas 77004

Telephone: (713) 630-0900

Facsimile: (713) 630-0991

Email: vg@robertsmarkland.com

Email: sr@robertsmarkland.com

Email: as@robertsmarkland.com

Email: eservice@robertsmarkland.com

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send an email notification of this filing to all registered parties.

/s/ Anjali Sharma

Anjali Sharma